www.sedgwicklaw.com 212.422.0202 phone 212.422.0925 fax

Sedgwick...

Todd D. McCormick (212) 898-5556 todd.mccormick@sedgwicklaw.com

April 7, 2014

Via Electronic Mail
Hon. Andrew L. Carter, Jr., U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: Zelouf International Corp. v. Nael, Inc., et al. Civ. Act. No. 13-CV-1788 (ALC)(JCF)

File No.: 00214-009006

Dear Judge Carter:

As you are aware, this office represents the defendant Lito Children's Wear, Inc. ("Lito") in the above-referenced action. We submit this letter pursuant to your individual practices to provide some context to the claims being made by Plaintiff Zelouf International Corp.'s ("Zelouf") in its Responses to Lito's and Defendant NaEl, Inc's ("NaEl") Letter Motions to the Court requesting a pre-motion conference to discuss briefing on a motion to dismiss for improper venue, or alternatively, to transfer venue.

Between July and October 2013, I had numerous telephone discussions with Zelouf's counsel regarding Lito's production of documents, as well as the potential for settlement. On or around October 23, 2013, during one of our phone discussions, Mr. Goldberg stated that I absolutely needed to get him something by Friday, October 25th. I told Mr. Goldberg that I was going to redact certain information from the documents and why, and he responded "just get me something." Accordingly, on October 25, 2013, I emailed Mr. Goldberg the documents he had requested and asked him to contact me to discuss the production if he had any issues. In total, I sent 24MB worth of pdf documents to Mr. Goldberg, which consisted of over 3,400 pages of invoices he had requested to determine whether venue was proper in New York.

After Lito's production on October 25th, I heard no further from Mr. Goldberg. No calls, no emails, no threats of sanctions.

Zelouf's Response to Lito's Letter Motion never mentions the thousands of pages of documents that we did produce, and may have left the impression that we had produced nothing. Compounding the issue, Zelouf's Response to NaEl's Letter Motion, merely admits that we did provide some documents. The fact of the matter is that every invoice requested was produced, and every invoice identifies, not only the shipping location of the retailers, but also identifies the billing location of those retailers. This information is the best indication of where a company's financial headquarters are located for purposes of determining venue, and therefore, Lito has complied with Zelouf's pre-Rule 26 discovery requests.

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 2 of 15

Hon. Andrew L. Carter, Jr., U.S.D.J.

Re: Zelouf International Corp. v. Nael, Inc., et al.

Civ. Act. No. 13-CV-1788 (ALC)(JCF)

April 7, 2014

Page 2

I am attaching hereto a copy of my email correspondence to Mr. Goldberg, dated October 25, 2013, for the Court's review. I have also included the first 10 pages of the attachments.

For the foregoing reasons, and those set forth in its Letter Motion dated March 31, 2014, Defendant Lito respectfully requests a pre-motion conference to discuss a briefing schedule for its proposed motion to dismiss Zelouf's claims against it for copyright infringement. Furthermore, we respectfully request that the time for filing an Answer, and the pretrial conference related to setting a discovery schedule, be stayed until the Court has ruled upon the proposed motion.

Thank you for your consideration of this matter.

Respectfully submitted,

s/

Todd D. McCormick (TM 2337) Sedgwick LLP

TDM

CERTIFICATE OF SERVICE

I, Todd D. McCormick, hereby certify and affirm that a true and correct copy of the attached **LETTER** dated **APRIL 7, 2014** was served via Electronic Mail on this 7th day of April, 2014, upon the following:

MICHAEL G. GOLDBERG, Esq. Pryor Cashman LLP 7 Times Square

New York, NY 10036

Telephone: (212) 421-4100

Facsimile: (212) 326-0806
Email: mgoldberg@pryorcashman.com
Attorney for Plaintiff

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Facsimile: (310) 417-3538 Email: scott@donigerlawfirm.com

Attorney for Na El, Inc.

MICHAEL STEGER

Steger Krane LLP

1601 Broadway, 12th Floor

New York, NY 10019

Telephone: (212) 736-6800

Facsimile: (845) 689-2155 Email: <u>msteger@skattorney.com</u> Co-Counsel for Na El, Inc.

5/

Todd D. McCormick (TM 2337)

Dated:

New York, New York

April 7, 2014

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 4 of 15

McCormick, Todd D.

From:

McCormick, Todd D.

Sent:

Friday, October 25, 2013 4:35 PM

To: Cc: 'Goldberg, Michael G.' Greenaway, Jennifer

Subject:

Lito / Zelouf / 00214-009006

Attachments:

c809h Redacted.pdf; c809i Redacted.pdf; c809j Redacted.pdf; c809t Redacted.pdf; c878h Redacted.pdf; c878i Redacted.pdf; c878t Redacted.pdf; c882h Redacted.pdf; c882i

Redacted.pdf; c882j Redacted.pdf; c882t-redacted.pdf; c911a-redacted.pdf; c911b-

redacted.pdf; c911c-redacted.pdf; c911d-redacted.pdf

Dear Mike:

Please find attached hereto electronic copies of invoices from our client, Lito Children's Wear ("Lito"), which reflect, among other things, the products manufactured and sold by Lito that utilized fabric containing patterns that form the subject matter of the present litigation.

Given our conversation earlier this week, during which we discussed potential settlement, you understand that it is our position that the only reason the Court ordered the parties to engage in informal discovery, prior to a Rule 26 conference, was to provide your client, Zelouf, with the information it needed in order to respond to: (1) Na El's motion to dismiss based upon lack of jurisdiction; and (2) Lito's motion to dismiss based upon improper venue. It is our position that anything outside the scope of documents needed by Zelouf to respond to these motions is controlled by FRCP Rule 26, which holds that Zelouf may not seek formal discovery from Lito on any other subjects until the parties conduct a conference pursuant to Rule 26(f).

Furthermore, it is also important to note that, as previously discussed, the only reason Lito is interested in discussing settlement is so that it will not be required to divulge the identity of its retailers, which could potentially have a negative affect on its future business. To date, Lito has produced copies of invoices between Lito and its suppliers, and sales figures for the manufactured product that utilized the allegedly infringing product. And with today's production of information, Zelouf now has all the information necessary to determine the gross profit obtained by Lito as a result of manufacturing and selling product which utilized the allegedly infringing patterns, and all the information it needs to respond to Lito's Motion to Dismiss for Improper Venue.

You will notice that the invoices attached have been redacted so that only the City, State and Zip Code of the retailers are visible. However, as stated above, we believe that the redacted information is not necessary for responding to Lito's Motion to Dismiss for Improper Venue. One need look no further than Title 28 U.S.C. § 1391(b) which states in pertinent part that "[a] civil action may be brought in . . . a judicial district in which any defendant resides, if all defendant are residents of the State in which the district is located" or in "a judicial district in which a substantial part of the events or omissions giving rise to the claim occurred" Even if we were to assume that all of Lito's retailers were residents of New York, knowing the identity of these retailers would still not assist Lito in defeating the motion, since § 1391(b) requires that all defendants reside in the State of the district chosen, and as you are aware, both Lito and Na El are residents of California. Moreover, knowing the identity of these retailers will similarly not assist Zelouf in arguing that a substantial part of the events occurred in New York.

We hope that you will find this production sufficient, and that we can continue our negotiations regarding the potential for settlement.

Should you like to discuss the contents of this correspondence or the attached production, please feel free to contact my office. I will be in DC from Sunday through Tuesday for a conference, however, I will be able to check my voicemails and emails intermittently.

Have a nice weekend.

Best regards,

Todd D. McCormick

Todd.McCormick@sedgwicklaw.com |



Our New York office has moved. Please note the new address. Phone and fax numbers remain the same.

225 Liberty Street, 28th Floor New York, NY 10281-1008 212.898.5556 *phone* | 212.422.0925 *fax* | www.sedgwicklaw.com

The information in this email is intended for the named recipients only. It may contain privileged and confidential matter. If you have received this email in error, please notify the sender immediately by replying to this email. Do not disclose the contents to anyone. Thank you.

IRS Circular 230 Disclosure: To ensure compliance with Treasury Department regulations, we inform you that any U.S. federal tax advice contained in this correspondence (including any attachments) is not intended to be used, and cannot be used, for the purpose of (i) avoiding penalties that may be imposed under the U.S. Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

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LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	Page: 1
Invoice	Date
517169	09/17/2010
51/169	09/17/2010

Bill To: Ship to: Redacted Redacted DAWSON SPRINGS KY 42408 DAWSON SPRINGS KY 42408 Acct Terms Rep1 Rep2 Ship Via Order Approval Purchase Order Dept. CREDIT CARD PDA UPS GROUND 206677 KYCCA 20726 Lead Tracking Number Division Phone Vendor 1Z8980470370386537 CHILDREN Redacted Total Units Price Total Amt. Description Style 6 6X C565H (RED) Red Plaid Vest w/ Black Pants RED 21.00 63.00 3 C565H 1 C565I M L 3 18.00 54.00 (RED) Red Plaid Vest w/ Black Pants RED C565I 1 1. 1 3Т C565T 3 19.00 57.00 (RED) Red Plaid Vest w/ Black Pants RED C565T 1 1 5 6 6X C807H 3 23.00 69.00 (BRP) Brown Velvet Top with Pink Plaid Skirt BROWN/PINK C807H 1 C807T 3T (BRP) Brown Velvet Top with Pink Plaid Skirt BROWN/PINK 21.00 63.00 C807T 1

1	
Due Date	09/18/2010
Total Charges	734.74
Pymts & Adjustments	-734.74

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	٦
830613	09/17/2010	1	44	08/15/2010	10/15/2010	517169	This Amt. 0.0	0

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 7 of 15

LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

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DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	Page: 2
Invoice	Date
517169	09/17/2010

	dacted ON SPRINGS	KY 42408	3					eda	acte	d RINGS KY	42408			
Acct	Purchase Order		Dept.		Terms		T	Rep1	Rep2	Ship Via			Order	Approval
KYCCA	20726			CREDIT	CARD			PDA		UPS GROUND)		206677	
Phone		Vendor								racking Number			ision	
Redac	cted								1Z8980	0470370386537			ILDREN	
tyle		Descriptio	n								Total Uni	its	Price	Total Amt.
C809H			5	6	6X	7								
C809H		(OLI) Burg	jundy Str	retch Velv	et with Oliv	e Taffeta	Skirt OLI	IVE				3	22.50	67.50
			1	1		1								
812T			2T	3T	4T									
2812T		(OLI) Olive	e Green	Taffeta D	ress with Bu	urgundy F	locking (DLIV	E			6	20.75	124.50
			2	2	2									
2813H			4	5	6	7								
C813H		(RED) Red	d Plaid D	ress RE	o 🗸 🔎							4	22.00	88.00
			1	1	11	1								
C814I			XS	S	M	L	XL		XXL	-				
C814I		(RED) Rea	d Plaid B	aby Dres	s RED 1	1	<i>\(\psi_1</i> \)					3	17.75	53.25
C814T			2T	3T	4T	4.4		F.A	The same of					
C814T		(RED) Re	d Plaid B	Baby Dres	s RED							3	18.75	56.25
							700			Merchandise		34		695.50
							-07			Freight				39.24

Due Date	09/18/2010
Total Charges	734.74
Pymts & Adjustments	-734.74

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	
830613	09/17/2010	1	44	08/15/2010	10/15/2010	517169	This Amt.	0.00

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 8 of 15

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DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	Page:
Invoice	Date
517201	09/20/2010

Redacted
LOS ANGELES CA 90023

Ship to:

Redacted

LOS ANGELES CA 90023

Acct	Purchase Order		Dept.		Terms		Rep1	Rep2	Ship Via			Order	Approval
CADDA	4691			NET 30			HOL	J	DELIVER			212267	
Phone		Vendor									Divisio	on	
Redac	cted										CHILI	DREN	
tyle		Descript	tion							Total Units	S	Price	Total Amt.
C809H			5	6	6X	7							
C809H		(OLI) Bu	rgundy S	tretch Velve	et with Olive	e Taffeta Ski	irt OLIVE				3	18.00	54.00
			1	1		1							
C809H		(PIN) BI	ack Streto	h Velvet w	ith Pink Taf	feta Skirt PII	NK				3	18.00	54.00
			1	1		1							
C809H		(SBL) B	rown Stre	tch Velvet	w/ Silver Blu	ue Taffeta SI	kirt SILVE	R BLU	E		3	18.00	54.00
			1	1		1							
C809I			XS	S	M	A Ba	XL	XXL					
C809I		(OLI) Bu	irgundy S	tretch Velv	et with Olive	e Taffeta Ski	int OLIVE				3	15.60	46.80
		(511) 51	-1.011-	le V leboekoo	/ Diels Taffe	to Chief DINI	/				3	15.60	46.80

			45.00	10.00
C809I	(PIN) Black Stretch Velvet w/ Pink Taffeta Skirt PINK	3	15.60	46.80
	1 The state of the			
C809I	(SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLUE	3	15.60	46.80
C809J	8 10 12 14			
C809J	(OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE	3	20.40	61.20
	1 1 1			
C809J	(PIN) Black Stretch Velvet with Pink Taffeta Skirt PINK	3	20.40	61.20
	1 1 1			

Due Date 10/20/2010
Total Charges 1,024.80
Pymts & Adjustments -1,024.80

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	
830672	09/20/2010	1		09/20/2010	10/31/2010	517201	This Amt.	0.00

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 9 of 15

LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	rage. 2
Invoice	Date
517201	09/20/2010

Order

212267

Approval

Redacted
LOS ANGELES CA 90023

Dept.

NET 30

Purchase Order

4691

Acct

CADDA

Redacted
LOS ANGELES CA 90023

Rep1 Rep2 Ship Via

DELIVER

HOU

Vendor									Divis	sion	
									CHII	LDREN	
Description	1							Total Uni	ts	Price	Total Amt.
	8	10	12	14							
(SBL) Brov	vn Streto	ch Velvet	w/ Silver B	lue Taffeta Skir	t SILVI	ER BLU	E		3	20.40	61.20
	1	1	1								
	2T	3T	4T								
(OLI) Burgi	undy Str	retch Velv	et with Oliv	e Taffeta Skirt	OLIVE				3	16.40	49.20
	1	1	1								
(PIN) Black	Stretch	n Velvet w	ith Pink Ta	ffeta Skirt PINE	<				3	16.40	49.20
	1	1	1								
(SBL) Brov	vn Strete	ch Velvet	w/ Silver B	lue Taffeta Skir	t SILVI	ER BLU	E		3	16.40	49.20
	1	1	1								
C)/S		The state of the s	· 20/ A							
(OLI) Amer	rican Do	oll Dress -	Flocked ta	ffeta dress OLI	VE				1	7.80	7.80
	1										
(PIN) Ame	rican Do	oll Dress -	Flocked ta	ffeta dress PIN	IK				1	7.80	7.80
	1										
(SBL) Ame	rican De	oll Dress -	Flocked to	affeta dress SIL	VER E	LUE			1	7.80	7.80
	(SBL) Brov (OLI) Burgi (PIN) Black (SBL) Brov (OLI) American	Description 8 (SBL) Brown Stretch 1 2T (OLI) Burgundy Stretch 1 (PIN) Black Stretch 1 (SBL) Brown Stretch 1 O/S (OLI) American Document of the stretch of the stretc	Description 8 10 (SBL) Brown Stretch Velvet 1 1 2T 3T (OLI) Burgundy Stretch Velvet 1 1 (PIN) Black Stretch Velvet w 1 1 (SBL) Brown Stretch Velvet 1 1 O/S (OLI) American Doll Dress - 1 (PIN) American Doll Dress -	Description	Description 8 10 12 14 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt 1 1 1 2T 3T 4T (OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt 1 1 1 (PIN) Black Stretch Velvet with Pink Taffeta Skirt PINH 1 1 1 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt 1 1 1 O/S (OLI) American Doll Dress - Flocked taffeta dress OLI 1 (PIN) American Doll Dress - Flocked taffeta dress PINH 1	Description 8 10 12 14 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVE 1 1 1 2T 3T 4T (OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE 1 1 1 (PIN) Black Stretch Velvet with Pink Taffeta Skirt PINK 1 1 1 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVE 1 1 1 O/S (OLI) American Doll Dress - Flocked taffeta dress OLIVE 1 (PIN) American Doll Dress - Flocked taffeta dress PINK	Description 8 10 12 14 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLU 1 1 1 2T 3T 4T (OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE 1 1 1 (PIN) Black Stretch Velvet with Pink Taffeta Skirt PINK 1 1 1 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLU 1 1 1 O/S (OLI) American Doll Dress - Flocked taffeta dress OLIVE 1 (PIN) American Doll Dress - Flocked taffeta dress PINK	Description 8 10 12 14 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLUE 1 1 1 2T 3T 4T (OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE 1 1 1 (PIN) Black Stretch Velvet with Pink Taffeta Skirt PINK 1 1 1 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLUE 1 1 1 O/S (OLI) American Doll Dress - Flocked taffeta dress OLIVE	Description 8 10 12 14 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLUE 1 1 1 2T 3T 4T (OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE 1 1 1 (PIN) Black Stretch Velvet with Pink Taffeta Skirt PINK 1 1 1 (SBL) Brown Stretch Velvet w/ Silver Blue Taffeta Skirt SILVER BLUE 1 1 1 O/S (OLI) American Doll Dress - Flocked taffeta dress OLIVE 1 (PIN) American Doll Dress - Flocked taffeta dress PINK	Description Total Units 8 10 12 14	CHILDREN Total Units Price

Terms

Due Date 10/20/2010
Total Charges 1,024.80
Pymts & Adjustments -1,024.80

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	\neg
830672	09/20/2010	1		09/20/2010	10/31/2010	517201	This Amt. 0.0	0

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 10 of 15

Ship to:

Redacted

Merchandise

60

LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Bill To:

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

Redacted

	Page: 3
Invoice	Date
517201	09/20/2010

1,024.80

Acct	Purchase Order		Dept.	T	Terms		Rep	Rep2	Ship Via		Ord	der	Approval
CADDA	4691			NET 30			HOL	J	DELIVER		21:	2267	
Phone		Vendor									Division		
Redac	cted										CHILDRE	.N	
tyle		Desc	ription							Total Units	Pric	e	Total Amt.
812H			5	6	7	8	10	12	! 14				
812H		(OLI)	Olive Green	Taffeta D	ress with Bur	gundy Flocki	ng OLIV	Έ		4	18.2	0	72.80
			1	1	1	1							
812H		(PIN)	Pink Taffeta	Dress wit	h Black Flock	king PINK				4	18.2	.0	72.80
			1	1	1	1							
812H		(SBL)	Silver Blue	Taffeta Dr	ess with Brow	wn Flocking	SILVER	BLUE		4	18.2	.0	72.80
		()	1	1	41	1							
812T			2T	3T	4T	1 4							
812T		(OLI)	Olive Green	Taffeta D	ress with Bur	aundy Flock	ng OLIV	Έ		3	16.6	0	49.80
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812T		(PIN)	Pink Taffeta	Dress wit	th Black Floci	kina PINK				3	16.6	0	49.80
		()	1	1	1								
812T		(SBL)	Silver Blue	Taffeta Dr	ess with Brow	wn Flocking	SILVER	BI UF		3	16.6	0	49.80
0121		(ODL)			1	1,00119		,dP					

Due Date	10/20/2010
Total Charges	1,024.80
Pymts & Adjustments	-1,024.80

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	
830672	09/20/2010	1		09/20/2010	10/31/2010	517201	This Amt.	0.00

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 11 of 15

LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	Page: 1
Invoice	Date
517209	09/20/2010

Redacted

ELIZABETH CITY NC 27909

Ship to:
Redacted

ELIZABETH CITY NC 27909

						$\overline{}$							
Acct	Purchase Order		Dept.	I	Terms		Rep1	Rep2	Ship Via			Order	Approval
NCPUA	20714			NET 30			PDA		UPS GROUND)		206374	
Phone		Vendor					1	Lead Tr	acking Number		Divisi	on	
Redac	cted							1Z8980	0470372717630		CHIL	DREN	
tyle		Description	on							Total Uni	ts	Price	Total Amt.
3711			2T	ЗТ	4T								
3711		(NAV) 5 F	CS SUI	T NAVY							1	19.50	19.50
					1								
3712			4	5	6	7							
3712		(KHA) 5 F	CS SUI	T KHAKI							1	20.50	20.50
					1/4								
3712		(NAV) 5 F	PCS SUIT	T NAVY							3	20.50	61.50
				1	1	1							
C807H			5	6	6X	7							
C807H		(BRP) Br	own Velv	et Top wit	th Pink Plaid	Skirt BROWN/	PINK				3	23.00	69.00
			1	1		IF A	The Title						
C807T			2T	3T	4T								
C807T		(BRP) Br	own Velv	et Top wit	th Pink Plaid	Skirt BROWN/	PINK				3	21.00	63.00
			1	1	1	THE THE	diff.	400					
C809H			5	6	6X	7	40	F					
C809H		(OLI) Bur	gundy St	retch Veh	vet with Olive	Taffeta Skirt C	LIVE				6	22.50	135.00
			2	2		2							
									Merchandise		17		368.50
									Freight				36.81

Due Date 10/20/2010
Total Charges 405.31
Pymts & Adjustments -405.31

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay
830648	09/20/2010	1	35	07/25/2010	09/30/2010	517209	This Amt. 0.0

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 12 of 15

LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	Page: 1
Invoice	Date
517394	09/24/2010

Bill To: Redacted Redacted LAKE ST LOUIS MO 63367 LAKE ST LOUIS MO 63367 Terms Rep1 Rep2 Ship Via Order Approval Acct Purchase Order Dept. 212405 PDA UPS GROUND CREDIT CARD MOPDA RUTH Lead Tracking Number Division Phone Vendor 1Z8980470371296490 CHILDREN Redacted **Total Units** Price Total Amt. Description Style BL203R-H 6 6X 23.50 23.50 (CHA) Taffeta bodice and layered skirt CHAMPAGNE 1 BL203R-H BL204W-T 2T 3T 23.75 23.75 BL204W-T (PIN) Three layer satin bubble dress PINK 1 4T ЗТ C561 3 18.50 55.50 (BUR) TAFFETA VEST AND PANT SET BURGUNDY C561 1 1 XL XXL XS S M C803I 20.00 20.00 1 (BLK) Stretch Velvet with Flocked Taffeta BLACK C803I C803T 3T 21.00 21.00 1 (BLK) Stretch Velvet with Flocked Taffeta BLACK C803T

_	
Due Date	09/25/2010
Total Charges	370.71
Pymts & Adjustments	-370.71

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	7
830811	09/24/2010	1	15	09/23/2010	10/31/2010	517394	This Amt. 0.00	٥

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LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Acct

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

Purchase Order

	Page: 2
Invoice	Date
517394	09/24/2010

Order

Approval

Redacted

LAKE ST LOUIS MO 63367

Dept.

Redacted

LAKE ST LOUIS MO 63367

Rep1 Rep2 Ship Via

MOPDA	RUTH			CREDI	T CARD		PDA		UPS GROUND			212405	
Phone		Vendor					L	ead	Tracking Number		Divisio	on	
Redac	cted						1	Z89	80470371296490		CHILD	DREN	
Style		Descripti	on							Total Units		Price	Total Amt.
C804H			4	5	6	7							
C804H		(RED) Re	ed Poly	Silk Dress	with Bolero F	RED				1	2	21.75	21.75
					1								
C804J			8	10	12	14							
C804J		(RED) Re	ed Poly	Silk Dress	with Bolero F	RED				2	2 2	24.75	49.50
			1	1									
C809H			5	6	6X	7							
C809H		(OLI) Bur	gundy S	Stretch Vel	vet with Olive	e Taffeta Skir	rt OLIVE			3	3 2	22.50	67.50
			1	1		1							
C812D	411-112-1-12-1-12-1-12-1-1		O/S				W.						
C812D		(OLI) Am	erican [Ooll Dress	- Flocked taf	feta dress Ol	LIVE			1	ļ	9.75	9.75
			1										
C812T			2T	3T	4T	THE STATE OF	aff A	The second	N				
C812T		(OLI) Oliv	ve Gree	n Taffeta D	ress with Bu	rgundy Flock	king OLIV	E P		3	3 2	20.75	62.25
			1	1	1								
							47		Merchandise	17	7		354.50
							-		Freight				16.21

Terms

-	
Due Date	09/25/2010
Total Charges	370.71
Pymts & Adjustments	-370.71

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	
830811	09/24/2010	1	15	09/23/2010	10/31/2010	517394	This Amt. 0.0	0

Case 1:13-cv-01788-ALC-JCF Document 40 Filed 04/07/14 Page 14 of 15

LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	Page: 1
Invoice	Date
517634	09/30/2010

Bill To:	Redacted	7091					Ship to			acted TN 37091				
Acct	Purchase Order		Dept.	T	Terms		F	Rep1	Rep2	Ship Via			Order	Approval
TNPRA	20739			NET 30			F	PDA		UPS GROUN)		206691	
Phone		Vendor						L	ead Tr	acking Number		Division	n	
Redac	cted							1	Z8980	0470371508242	2	CHILD	REN	
tyle		Descript	tion								Total Units	F	Price	Total Amt.
3732			4	5	6	7								
3732		(DGR) D	ARK GR	AY PIN-S	TRIPED SUIT	DARK GR	RAY				1	2	0.50	20.50
		,				1								
3733			8	10	12	14								
3733		(DGR) [OARK GR	AY PIN-S	TRIPED SUIT	DARK GR	RAY				2	2 2	4.50	49.00
				1	14									

3732	(DGR) DARK GRAY PIN-STRIPED SUIT DARK GRAY	1	20.50	20.50
	1			
3733	8 10 12 14			
3733	(DGR) DARK GRAY PIN-STRIPED SUIT DARK GRAY	2	24.50	49.00
	1 1.4			
C809H	5 6 6X 7			
С809Н	(OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE	6	22.50	135.00
	2 2 2			
C809J	8 10 12 14			
C809J	(OLI) Burgundy Stretch Velvet with Olive Taffeta Skirt OLIVE	6	25.50	153.00
	2 2 2			
C860H	5 6 6X 7			
C860H	(PIN) Stretch Velvet w/ Flocked Tulle & Glitter Skirt PINK	6	25.00	150.00
	2 2 2			

Due Date	10/30/2010
Total Charges	860.99
Pymts & Adjustments	-860.99

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	
831080	09/30/2010	1	57	08/15/2010	10/15/2010	517634	This Amt.	0.00

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LITO CHILDRENS WEAR, INC. 3730 UNION PACIFIC AVENUE LOS ANGELES CA 90023

United States

Tel: (323) 260-4692 Fax: (323) 260-4784

DUNS 02-015-3110 www.litoonline.com info@litoonline.com

	, -9
Invoice	Date
517634	09/30/2010

2

Page:

Bill To: Ship to: Redacted Redacted LEWISBURG TN 37091 LEWISBURG TN 37091 Acct Purchase Order Dept. Terms Rep1 Rep2 Ship Via Order Approval TNPRA 20739 NET 30 PDA UPS GROUND 206691 Phone Vendor Lead Tracking Number Division Redacted 1Z8980470371508242 CHILDREN Style Description Total Units Price Total Amt. C860J 10 12 C860J (PIN) Stretch Velvet w/ Flocked Tulle & Glitter Skirt PINK 6 28.00 168.00 2 C860T 3T C860T (PIN) Stretch Velvet w/ Flocked Tulle & Glitter Skirt PINK 6 23.00 138.00 2 2 2 Merchandise 33 813.50 Freight 47.49

Due Date	10/30/2010
Total Charges	860.99
Pymts & Adjustments	-860.99

Pick Ticket	Ship Date	No. Ctns.	Weight	Start	Complete	Invoice	Pay	
831080	09/30/2010	1	57	08/15/2010	10/15/2010	517634	This Amt. 0.0	0